

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a PORNHUB.COM,
MG FREESITES II LTD., MINDGEEK
S.A.R.L., MINDGEEK USA, INC., MG
BILLING LTD., and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**MOTION TO EXCEED PAGE
LIMITATION OF TRAFFICSTARS
LTD'S REPLY TO PLAINTIFFS'
RESPONSE IN OPPOSITION TO
MOTION TO DISMISS**

The undersigned counsel files this Motion to Exceed Page Limitation with respect to Trafficstars, LTD's reply to Plaintiffs' Response in Opposition to its Motion to Dismiss, and would respectfully show the Court the following:

1. Local Rule 7.05(B)(2) of the District Court for the District of South Carolina states that reply briefs are limited to fifteen pages. Because Trafficstars, LTD's reply to Plaintiffs' response is longer than fifteen pages, Trafficstars, LTD requests leave of Court to exceed the page limitation.

2. Good cause exists for extending the page limitation. Trafficstars, LTD filed a motion to dismiss the Plaintiff's complaint for lack of jurisdiction and for failure to state a claim, ECF#246, on December 23, 2022. Plaintiffs filed their response to Trafficstars, LTD's motion to dismiss on February 20, 2023, ECF#275.

3. The facts and arguments raised in Trafficstars, LTD's motion to dismiss and Plaintiffs' response thereto are complicated and involve multiple entities. The Plaintiffs response to the motion to dismiss exceeded the number of pages allowed by Local Rule 7.05(B)(1).

4. Due to the multitude of issues, the number of parties, and the length of Plaintiff's response, it is impossible for Trafficstars, LTD to avoid exceeding the page limitation. Moreover, while Defendant's memorandum may exceed the page limitation allowed under the rules, the length of Defendant's single memorandum to be filed is necessitated by the fact that it is submitted in reply to the respective motions to dismiss and responses thereto for three Defendants: Trafficstars, LTD, Wisebits, LTD, and Wisebits IP, LTD.

5. Plaintiff consents to Defendant Trafficstars, LTD's motion to exceed the page limitation.

For the foregoing reasons, Trafficstars, LTD respectfully requests the Court grant it leave to exceed the page limitation for Trafficstars, LTD's Reply to Plaintiff's Response in Opposition to Defendant Trafficstars, LTD's Motions to Dismiss.

Respectfully requested,

s/ Hannah Rogers Metcalfe

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March 10, 2023
Greenville, South Carolina